

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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**DEBRA SPERO, as Natural Mother of  
V.S., an infant,**

Plaintiffs,

v.

**VESTAL CENTRAL SCHOOL DISTRICT  
BOARD OF EDUCATION, VESTAL CENTRAL  
SCHOOL DISTRICT, JEFFREY AHEARN,  
Superintendent of Schools, ALBERT A. PENNA,  
Interim Principal of Vestal High School,  
DEBORAH CADDICK and CLIFFORD KASSON,  
in their Individual and Official Capacities,**

Defendants,

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**AFFIDAVIT OF DEBORAH  
CADDICK**

Civil Action No.: 3:17-cv-00007  
(GTS/DEP)

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF BROOME     )

DEBORAH CADDICK, being duly sworn, deposes and says:

1. I was employed as an assistant principal at the Vestal Central School District high school during the periods relevant to the information in this affidavit. I am now retired. I make this affidavit of my own personal knowledge and am fully competent to testify as to all matters herein.

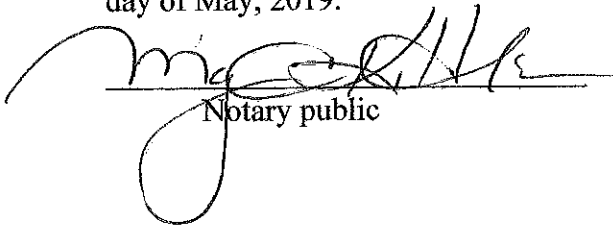
2. During first period on the morning of December 1, 2016, I met with Plaintiff Vincent Spero and informed him that he was being placed on "senior probation" for calling Ms. Dyer a "fucking racist" during class on November 22. Senior probation is a conditional disciplinary penalty whereby, if the student commits a further disciplinary infraction, he or she will be prohibited from participating in "senior activities" such as the prom.

3. During the December 1, 2016 meeting, Plaintiff admitted he called Ms. Dyer a “fucking racist.”

4. During the December 1, 2016 meeting, Plaintiff did not claim Ms. Dyer had used the “n word.” He did claim that Ms. Dyer had seated some of the students of color in the back of the room in the previous September.

  
**Deborah Caddick**

Sworn to before me this 28  
day of May, 2019.

  
Notary public

MARY ANN KITTLE  
NOTARY PUBLIC STATE OF NEW YORK  
BROOME  
LIC. #01KI5022787  
COMM. EXP. January 18, 2022